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Attorney for Defendant, *Laura Velree Guida*

**UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAURA VELREE GUIDA,

Defendant.

CASE No.: 2:19-cr-00077-RFB-VCF-2

**STIPULATION TO CONTINUE
SENTENCING**

(FOURTH REQUEST)

IT IS HEREBY STIPULATED BY AND BETWEEN Defendant, Laura Velree Guida, through her counsel, Lance J. Hendron, Esq. of the law firm of Hendron Law Group LLC, and Plaintiff, United States of America, through its counsel, Nicholas A. Trutanich, United States Attorney, Susan Cushman, Assistant United States Attorney, that the Sentencing in the above-captioned matter currently set for April 9, 2020 at 11:15 a.m. be continued to at least 120 days.

This Stipulation is entered into for the following reasons:

1. Ms. Guida is out of jurisdiction and potential travel restrictions due to COVID-19.
2. While preparing the mitigation file, issues were discovered that need to be investigated prior to sentencing.
3. Mr. Hendron has spoken with Ms. Guida and she agrees with this continuance.

4. Mr. Hendron has spoken to Ms. Cushman, and Ms. Cushman has indicated that she has no objection to this continuance.
5. Ms. Guida respectfully asks the Court to continue sentencing to the same date and time as that of Co-Defendant Jaleah Guida.
6. Mr. Hendron has spoken to Ms. Cushman, and Ms. Cushman has indicated that she has no objection to continuing Sentencing to the same date and time as that of Co-Defendant Jaleah Guida.
7. Additionally, denial of this request for continuance could result in a miscarriage of justice.
8. In addition, the continuance sought is not for delay and the ends of justice are in fact served by the granting of such continuance which outweigh any interest of the public and the defendant in proceeding with sentencing on April 9, 2020.

DATED this 3rd day of April, 2020.

Respectfully Submitted,

/s/ L. Hendron

Lance J. Hendron, Esq.

Attorney for Defendant, *Laura Guida*

/s/ Susan Cushman

Nicholas A. Trutanich, Esq.

United States Attorney

Susan Cushman, Esq.

Assistant United States Attorney

Attorney for United States

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**UNITED STATES DISTRICT COURT
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Plaintiff,

vs.

LAURA VELREE GUIDA,

Defendant.

FINDINGS OF FACTS

Based on the pending Stipulation of Counsel, and good cause appearing
therefore, the Court finds that:

1. Ms. Guida is out of jurisdiction and potential travel restrictions due to COVID-19.
2. Mr. Hendron and Ms. Cushman acknowledge that there are issues that require resolution prior to sentencing, in pertinent part, preparation of a mitigation file which is still in the process of being prepared and the further investigation of potential issues that have arisen while interviewing clients for the mitigation film.
3. Mr. Hendron has spoken with Ms. Guida and she agrees with this continuance.

- 1 4. Mr. Hendron has spoken to Ms. Cushman, Assistant United States
2 Attorney, who has no objection to this continuance.
- 3 5. Ms. Guida respectfully asks the Court to continue Sentencing to the
4 same date and time as that of Co-Defendant Jaleah Guida.
- 5 6. Mr. Hendron has spoken with Ms. Cushman, Assistant United States
6 Attorney, and she has no objection to continuing Sentencing to the
7 same date and time as that of Co-Defendant Jaleah Guida.
- 8 7. Additionally, denial of this request for continuance could result in a
9 miscarriage of justice.
- 10 8. In addition, the continuance sought is not for delay and the ends of
11 justice are in fact served by granting of such continuance which
12 outweigh any interest of the public and the defendant in proceeding
13 with sentencing on April 9, 2020.

14 **ORDER**

15 IT IS HEREBY ORDERED, that the Sentencing hearing, currently
16 scheduled for April 9, 2020, at the hour 11:15 a.m., be vacated and continued to
17 August 13, 2020, at the hour of 11:00 a.m.

18 DATED this 7th day of April, 2020.

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26 RICHARD F. BOULWARE, II
27 UNITED STATES DISTRICT JUDGE
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